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August 31, 2022

VIA ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Jennifer S. Fischman v. Mitsubishi Chemical Holdings America, Inc., et al*
Civil Action No. 1:18-cv-08188

Dear Judge Furman:

We represent defendants Mitsubishi Chemical Holdings America, Inc., Nicolas Oliva, and Donna Costa, in connection with the above-referenced matter. Pursuant to Your Honor's August 24, 2022 Order [ECF Document No. 129], the parties jointly submit this proposed briefing schedule:

Defendants to file a single Motion for Summary Judgment, and Plaintiff to file any *Daubert* Motion(s) on or before November 1, 2022;

Parties to file their respective oppositions on or before December 20, 2022;

Parties to file their respective replies on or before January 27, 2023.

We thank the Court for its consideration of this correspondence, and attention to this matter.

Respectfully submitted,

/s/ Mercedes Colwin
Mercedes Colwin

cc: All Parties (via ECF)